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8 Attorney for Defendant
9 ARMAND ION

10 UNITED STATES DISTRICT COURT
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA, }

13 Plaintiff, }

14 v. }

15 ARMAND ION, }

16 Defendant. }

Case No. 8:22-cr-00145-1

**DEFENDANT'S SENTENCING
POSITION WITH EXHIBIT**

17
18 Defendant ARMAND ION, through counsel, hereby submits his Sentencing
19 Position, with Exhibit.

20 Defendant reserves the opportunity to make additional comments at the
21 sentencing hearing in this matter.

22
23 Date: June 10, 2024

Respectfully submitted:

24 LAW OFFICE OF
25 ANDREW M. STEIN

26 By /s/Andrew M. Stein
27 ANDREW M. STEIN
28 Attorney for Defendant
ARMAND ION

I.

OVERVIEW AND RECOMMENDED SENTENCE

On February 7, 2024, Defendant Armand Ion, age 43, pleaded guilty to Counts 2 and 4 of the indictment in violation of 18 U.S.C. § 1344(2) and 18 U.S.C. §1028(A)(1).

The presentence report has done a thorough and precise job explaining the defendant's background and characteristics.

The United States Probation Office (USPO) recommends a sentence of 51 months. While the Defendant, through counsel, believes that the USPO has done an exceptional job of presenting the issues in this case, we would ask for a lesser prison term.

II.

ACCEPTANCE OF RESPONSIBILITY

Mr. Ion's remorse statement for being involved in this criminal enterprise is attached in a letter hereto as Exhibit "A".

III.

OBJECTIONS TO PRESENTENCE REPORT

The Defendant objects to paragraphs 67 through 72 of the Presentence Report, in that he has no way to verify the statements in said paragraphs.

IV.

CONCLUSION

Based on the foregoing grounds, including the defendant's remorse and personal self-rehabilitation, Defendant through counsel, respectfully requests that he be sentenced to less than the 51 month term of imprisonment recommended by the

1 U.S. Probation Office, to be followed by 3 years and supervised release and a fine of
2 \$10,000.

3 It is submitted that sentenced along these lines would be “sufficient, but not
4 greater than necessary” to effectuate justice and to adequately address the sentencing
5 factors set forth at 18 U.S.C. § 3553(a).
6

7 Date: June 10, 2024

Respectfully submitted:

8 LAW OFFICE OF
9 ANDREW M. STEIN

10 By /s/Andrew M. Stein
11 ANDREW M. STEIN
12 Attorney for Defendant
13 ARMAND ION
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